

William Soler Justice pro se

Plaintiff(s)

v.

Case No. 1_20_CV_00517_PB

Christopher T. Sununu, et al.

Defendant(s)

MOTION TO/FOR Response to Hanks Objection to motion to compel

(enter title of motion)

1. Plaintiff is responding to Document # 49. Item # 19. Fourth Affirmative Defense: Defendants have not violated Plaintiff's federal constitutional right to receive adequate medical care.
2. Plaintiff is looking for discovery of failures in Secure Psychiatric Unit (SPU) services. Plaintiff is also seeking to clarify the States own statements in this litigation about an independent separate autonomous facility. Plaintiff is challenging credibility issues with defendant .
3. Many of these questions can be completed with a simple yes or no answer and accompanying documentation. However, the defendant has chosen to characterize the words "license and reimbursement" as not understood. Plaintiff has previously submitted documentation from 2006 showing state actors proposing combining SPU and New Hampshire Hospital (NHH) to facilitate reimbursement for SPU. Given AAG Gagnon's statements in "response for Randall Carver" indicating that SPU is an independent treatment facility and the 2006 letter it appears the state maybe engaged in malfeasance involving representing the plaintiffs incarceration as a hospitalization to a federal payer for reimbursement.

Enter text of motion using numbered paragraphs (explain what you want the court to do). The field will expand as you type.

Date: 02/28/24 (Wed.)

William S. Justice
Signature



MEMORANDUM OF LAW

Pursuant to LR 7.1(a)(2), every motion shall be accompanied by a memorandum with citations to supporting authorities or a statement explaining why a memorandum is unnecessary.

- ☐ I have attached a supporting memorandum of law to this motion.
- ☒ I have NOT attached a memorandum of law because none is required (explain your reasoning below).

The Federal Rules of Civil Procedure have very liberal discovery provisions.

Discovery under the Federal Rules is very broad. According to Rule 26(b)(1), "Parties may obtain discovery regarding any non-privileged matter that is relevant to any party's claim or defense." The federal rules also provide several tools that can be used to get information from other parties, including interrogatories, depositions, and requests for admission. A party may also compel other parties to give them access to documents, real property, or other things for review or testing. See Rules 26-37.

CONCURRENCES SOUGHT

Pursuant to LR 7.1(c), any party filing a motion other than a dispositive motion (a dispositive motion seeks an order disposing of one or more claims in favor of the moving party, for example, a motion to dismiss or a motion for summary judgment) shall certify to the court that a good faith attempt has been made to obtain concurrence/agreement in the relief sought. If concurrence is obtained, the moving party shall so note.

I certify the following (choose one):

- ☐ All parties have assented/agreed to this motion.
- ☐ I made a good faith attempt, but was unable to successfully obtain concurrence/agreement from all parties.
- ☒ I have NOT attempted to obtain concurrence/agreement because it is not required.

CERTIFICATE OF SERVICE

I hereby certify that this motion was served on the following persons on the date and in the manner specified below:

Person(s) served electronically (via ECF):

Person(s) served by mail. Please include address(es):

Jennifer Bartlett (case manager)
U.S. Dist. Court (NH)
55 Pleasant St. Rm. 110
Concord, NH 03301

Person(s) served by hand:

Date of Service: 02/28/24 (Wed.)

Signature: William S. Justice

Name: William Justice

Address: 51 Storrs St
Apt 310
Concord, NH 03301

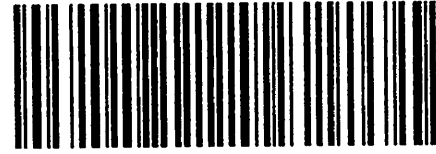
Phone: 603-931-6357

Email: gentlegiant03301@yahoo.com

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CERTIFIED MAIL

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Retail



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